

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA

VS.

CHRISTOPHER STEPHEN BROWN

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§

CASE NO. 2:21-MJ-0198-BR

**JOINT MOTION FOR EXAMINATION OF COMPETENCY TO STAND
TRIAL AND SANITY AT TIME ALLEGED OFFENSE COMMITTED**

CHRISTOPHER STEPHEN BROWN (“Brown”), the above-named defendant, by and through his attorney, Eric Coats, Assistant Federal Public Defender, files this motion pursuant to Title 18, United States Code §§ 4241(a), 4242(a), and 4247(d), for entry of an order providing that Brown be examined at a United States Medical Center for Federal Prisoners to determine whether he is competent to stand trial, and whether or not he was legally insane at the time of commission of the alleged offense, and in support of said motion, respectfully shows the Court as follows:

I.

Undersigned counsel was appointed to represent Brown on December 9, 2021 and met with Brown on December 9, 2021. As a result of this attorney-client conference, it is the opinion of counsel that Brown is presently suffering from a mental disorder or defect which may render him mentally incompetent to the extent that he is unable to understand the nature and consequences of the proceedings against him or to assist properly in his defense. Undersigned counsel further questions the legal sanity of Brown at the time the alleged offense was committed. Accordingly, counsel has also filed a Notice of Insanity defense in this cause.

II.

For these reasons, and to fully comply with his legal and ethical duties in providing representation to Brown, undersigned counsel respectfully requests that this Court enter an order directing that Brown be examined at a United States Medical Center for Federal Prisoners to determine whether he is competent to stand trial and to further determine whether or not Brown was legally insane at the time of the commission of the alleged offense.

After speaking with Assistant United States Attorney Joshua Frausto, undersigned counsel has confirmed that the government joins in the request that this motion be granted. Additionally, the defense moves this court to postpone any further proceedings in this case until the matter of Mr. Brown's competency and sanity is resolved.

Respectfully submitted,

JASON D. HAWKINS
Federal Public Defender
Northern District of Texas

/s/ Eric Coats
ERIC COATS
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Phone (806) 324-2370
Texas Bar No. 00783845

**ATTORNEY FOR DEFENDANT
CHRISTOPHER STEPHEN BROWN**

CERTIFICATE OF CONFERENCE

This is to certify that the undersigned counsel has consulted with Joshua Frausto, Assistant U.S. Attorney, regarding this Motion, and he indicated that the Government AGREES with the foregoing motion.

/s/ Eric Coats

ERIC COATS

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2021, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to Assistant U.S. Attorney Joshua Frausto, the attorney of record in this case, who has consented in writing to accept this Notice as service of this document by electronic means.

/s/ Eric Coats

ERIC COATS